

## REMARKS

As a preliminary matter, Applicants appreciate the Examiner taking time out of her busy schedule to discuss the application with Applicants' attorneys. The claims and the cited references were discussed. To expedite prosecution of the application, the claims have been amended for the sake of clarity and to better define them.

Claims 1-9, 11, 13, 15, 17-19 and 21-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bezos et al. (U.S. 6,029,141) in view of Wical (U.S. 6,460,034). Applicants traverse since neither of the references, alone or in combination, disclose or suggest at least arranging "the information in the dossier into expandable nodes which expand into subnodes, wherein the expandable nodes are arranged according to categories of people, topics, clients, documents and projects". Moreover, the claims as amended recite presenting "an alternate list consisting of industries not associated with the client " and displaying "a graphical image of links between the nodes and the subnodes according to relationships the node has to the subnodes," which is not disclosed or suggested by Bezos et al. or Wical, alone or in combination.

Bezos et al. teaches an Internet-based referral system that may enable individuals and other business entities to market products, in return for a commission, that are sold from a merchant's website. The system includes automated registration software that runs on the merchant's website. Hypertextual catalog documents may be distributed via the website. The site may include marketing information about the selected products. Customers may link to the merchant's website to purchase the products. A shopping cart allows the customer to select products from multiple different websites and then perform a single check out from the merchant's site. If a customer purchases the products from the merchant's site, a commission may automatically be credited to an account of the referring individual or business entity. As acknowledged by the Office Action, Bezos et al. does not disclose or suggest the recited arranging of information. See Office Action p. 6.

Wical fails to fill the gaps. Wical discloses a knowledge base search and retrieval system, which includes factual knowledge base queries and concept knowledge base queries. A knowledge base stores associations among terminology/categories that have a lexical, semantic or usage association. Document theme vectors identify the content of documents through themes as well as through classification of the documents in

categories that reflects what the documents are primarily about. The factual knowledge base queries identify, in response to an input query, documents relevant to the input query through expansion of the query terms as well as through an expansion of themes. A user is able to enter a subject or topic and receive a list of documents that may be related to that subject or topic. For example, the user may wish to search for an article about wine. A document about wine, appearing in a wine club magazine, may include the words "vineyards", "Chardonnay", "barrel fermented", and "french oak", which are all words associated with wine. If the article includes many content carrying words that relate to the making of wine, then the search and retrieval system infers that the main topic of the document is about wine, even though the word "wine" may only appear a few times, if at all, in the article. See Col. 4, lines 12-20. Therefore, Wical may disclose a search and retrieval system that identifies documents, but Wical does not disclose or suggest arranging information in nodes and subnodes "according to categories of people, topics, clients, documents and projects". Wical also does not disclose or suggest displaying "a graphical image of links between the nodes and the subnodes according to relationships that the node has to the subnode."

Conversely, the claims recite arranging "the information in the dossier into expandable nodes which expand into subnodes, wherein the expandable nodes are arranged according to categories of people, topics, clients, documents and projects", and displaying such information. The information used for the dossier is found during searches, "wherein the dossier comprises information relevant to the selected industry, the client and the proposal, and further comprises information concerning experienced people, prior documents, and past projects pertaining to the proposal." For at least this reasons, Applicants respectfully request that the rejections to the claims be withdrawn.

In addition, neither Bezos et al. nor Wical, disclose or suggest, presenting "an alternate list of industries not associated with the client." The rejection cites Bezos, col. 1, lines 62-66, as teaching this feature. The passage discusses referral links, in which the associate's catalogue documents have product-specific hyperlinks to allow potential customers to link to the associate's Web-site to initiate purchases of these products. This passage discusses products associated with an associated merchant, but there is no teaching or suggestion of an industry, a list of industries, or an alternate list of

industries not associated with a client. Wical fails to fill the gaps. For at least this additional reason, Applicants respectfully request that the rejection to the claims be withdrawn.

Moreover, there is no motivation to combine the customer referral system of Bezos et al. with the document knowledge base research and retrieval system of Wical. The system of Bezos et al. is concerned with effectively marketing goods and attracting customers via the Internet. The system of Wical is concerned with a search and retrieval system of a knowledge base. Wical does not disclose or suggest that the search and retrieval system can be used for a customer referral system, and Bezos et al. does not disclose or suggest that the information in the customer referral system can be displayed in the way information of Wical is displayed. For at least this additional reason, Applicants respectfully request that the rejection be withdrawn.

For at least the above-identified reasons, Applicants respectfully request that the application be allowed. If for any reason, the Examiner believes that an interview would be helpful to resolve any remaining issues, she is invited to contact the undersigned attorneys at (312) 321-4200.

Respectfully submitted,

  
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